

United States Bankruptcy Court
Middle District of Pennsylvania

In re:
Subetrice Ternice Samuel
Debtor(s)

Case No. 20-02670-HWV
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0314-1
Date Rcvd: Oct 16, 2020

User: AutoDocket
Form ID: pdf002

Page 1 of 3
Total Noticed: 36

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
++	Addresses marked '++' were redirected to the recipient's preferred mailing address pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.P.2002(g)(4).

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 18, 2020:

Recip ID	Recipient Name and Address
db	+ Subetrice Ternice Samuel, 1616 State Street, Harrisburg, PA 17103-1465
5357514	+ ASPIRE FAMILY MEDICINE, 49 PRINCE STREET, HARRISBURG, PA 17109-3113
5357515	+ CITY OF HARRISBURG, DEPT OF BLDG & HOUSING DEVEL, 10 N 2ND ST, STE 206, HARRISBURG, PA 17101-1677
5357516	CITY OF HARRISBURG, DEPT OF PUBLIC WORKS, 1820 PAXTON STREET, HARRISBURG, PA 17104-2826
5357518	COMMONWEALTH OF PA, OFFICE OF THE ATTORNEY GENERAL, 14TH FL STRAWBERRY SQUARE, HARRISBURG, PA 17120-0001
5357540	COMMONWEALTH OF PA DEPT L&I, READING B&C UNIT UTCS, 625 CHERRY ST ROOM 203, READING, PA 19602-1152
5357519	+ DAUPHIN COUNTY TAX CLAIM, 2 SOUTH 2ND STREET, HARRISBURG, PA 17101-2047
5357521	ECKERT SEAMANS CHERIN MELLOTT, 600 GRANT ST, 44TH FLOOR, US STEEL TOWER, PITTSBURGH, PA 152192788
5357522	+ FAST APPLIANCE REPAIR INC, 2200 N 11TH STREET, READING, PA 19604-1206
5357523	GM FINANCIAL-BANKRUPTCY DEPT, PO BOX 183853, ARLINGTON, TX 76096-3853
5357524	KEYSTONE COLLECTIONS GROUP, 546 WENDEL ROAD, IRWIN, PA 15642-7539
5357525	LABORATORY CORP OF, AMERICA HOLDINGS, PO BOX 2240, BURLINGTON, NC 27216-2240
5357526	+ LINEBARGER GOGGAN BLAIR & SAMPSON, PO BOX 90128, HARRISBURG, PA 17109-0128
5357528	+ OIP, 3399 TRINDLE ROAD, CAMP HILL, PA 17011-2286
5357529	OIP PT EAST, 5300 DERRY ST 2ND FLOOR, HARRISBURG, PA 17111-3576
5359778	+ Orthopedic Surgeons of PA, c/o Orthopedic Institute of PA, 3399 Trindle Road, Camp Hill, PA 17011-4407
5357530	+ PENN CREDIT CORP, 2800 COMMERCE DRIVE, PO BOX 69703, HARRISBURG, PA 17106-9703
5357532	+ PINNACLE HEALTH, 409 SOUTH SECOND STREET, PO BOX 1286, HARRISBURG, PA 17108-1286
5357533	+ PINNACLE HEALTH REGIONAL PHYSICIANS, 409 SOUTH SECOND STREET, PO BOX 1286, HARRISBURG, PA 17108-1286
5357535	+ SEQUIUM ASSET SOLUTIONS LLC, 1130 NORTHCHASE PKWY, MARIETTA, GA 30067-6413
5357534	+ Select Portfolio Servicing, Inc., 3815 South West Temple, Salt Lake City, UT 84115-4412
5357537	+ TRANSWORLD SYSTEMS INC, CORRESPONDENCE, PO BOX 17221, WILMINGTON, DE 19850-7221

TOTAL: 22

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
cr	+ Email/Text: GMFINANCIAL@EBN.PHINSOLUTIONS.COM	Oct 16 2020 19:19:00	Americredit Financial Services, Inc. Dba GM Finan, PO Box 183853, Arlington, TX 76096-3853
cr	+ Email/Text: blegal@phfa.org	Oct 16 2020 19:19:00	Pennsylvania Housing Finance Agency/Homeowner's Em, 211 North Front Street, Harrisburg, PA 17101-1406
5359884	Email/Text: GMFINANCIAL@EBN.PHINSOLUTIONS.COM	Oct 16 2020 19:19:00	AmeriCredit Financial Services, Inc., dba GM Financial, P O Box 183853, Arlington, TX 76096
5358989	+ Email/Text: GMFINANCIAL@EBN.PHINSOLUTIONS.COM	Oct 16 2020 19:19:00	Americredit Financial Services, Inc., d/b/a GM Fin, 4000 Embarcadero Dr., Arlington, TX 76014-4101
5357538	+ Email/Text: dehartstaff@pamd13trustee.com	Oct 16 2020 19:19:00	CHARLES J DEHART, III, ESQ., 8125 ADAMS DRIVE STE A, HUMMELSTOWN PA 17036-8625
5357517	Email/Text: documentfiling@lciinc.com	Oct 16 2020 19:18:00	COMCAST (BK NOTICES), PO BOX 1931, BURLINGAME, CA 94011-1931

5357539	Email/Text: RVSVCBICNOTICE1@state.pa.us	Oct 16 2020 19:19:00	COMM OF PA DEPT OF REVENUE, BUREAU OF COMPLIANCE, DEPT 280946, HARRISBURG, PA 17128-0946
5357520	Email/Text: G06041@att.com	Oct 16 2020 19:19:00	DIRECTV CUSTOMER SERVICE, BANKRUPTCY CLAIMS, PO BOX 6550, GREENWOOD VILLAGE CO 80155-6550
5360689	Email/Text: jennifer.chacon@spservicing.com	Oct 16 2020 19:19:00	Deutsche Bank National Trust Company, et al, c/o Select Portfolio Servicing, Inc., P.O. Box 65250, Salt Lake City, UT 84165-0250
5358988	Email/Text: G06041@att.com	Oct 16 2020 19:19:00	Directv, LLC, by American InfoSource as agent, PO Box 5072, Carol Stream, IL 60197-5072
5357541	Email/Text: sbse.cio.bnc.mail@irs.gov	Oct 16 2020 19:18:00	INTERNAL REVENUE SERVICE, PO BOX 21126, Philadelphia, PA 19114
5357527	Email/Text: Bankruptcies@nragroup.com	Oct 16 2020 19:19:00	NATIONAL RECOVERY AGENCY, 2491 PAXTON STREET, HARRISBURG, PA 17111-1036
5357531	Email/Text: blegal@phfa.org	Oct 16 2020 19:19:00	PHFA /HEMAP, PO BOX 15206, HARRISBURG, PA 17105-5206
5357536	+ Email/Text: bankruptcy@sw-credit.com	Oct 16 2020 19:19:00	SW CREDIT SYS, 4120 INTERNATIONAL PKWY STE 1100, CARROLLTON, TX 75007-1958

TOTAL: 14

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
cr	*+	Americredit Financial Services, Inc., d/b/a GM Fin, 4000 Embarcadero Dr., Arlington, TX 76014-4101
5365042	*P++	AMERICREDIT FINANCIAL SERVICES DBA GM FINANCIAL, PO BOX 183853, ARLINGTON TX 76096-3853, address filed with court., Americredit Financial Services, Inc., Dba GM Financial, P.O Box 183853, Arlington, TX 76096
5365043	*P++	AMERICREDIT FINANCIAL SERVICES DBA GM FINANCIAL, PO BOX 183853, ARLINGTON TX 76096-3853, address filed with court., Americredit Financial Services, Inc., Dba GM Financial, P.O Box 183853, Arlington, TX 76096
5357513	*+	Subetrice Ternice Samuel, 1616 State Street, Harrisburg, PA 17103-1465

TOTAL: 0 Undeliverable, 4 Duplicate, 0 Out of date forwarding address

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Oct 18, 2020

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 16, 2020 at the address(es) listed below:

Name	Email Address
Brian Nicholas	

District/off: 0314-1
Date Rcvd: Oct 16, 2020

User: AutoDocke
Form ID: pdf002

Page 3 of 3
Total Noticed: 36

on behalf of Creditor Deutsche Bank National Trust Company as Trustee, in trust for the registered holders of Morgan Stanley
ABS Capital I Inc. Trust 2004-HE6, Mortgage Pass-Through Certificates, Series 2004-HE6 bnicholas@kmlawgroup.com

Charles J DeHart, III (Trustee)

TWecf@pamd13trustee.com

Dorothy L Mott

on behalf of Debtor 1 Subetrice Ternice Samuel DorieMott@aol.com
KaraGendronECF@gmail.com;mottgendronecf@gmail.com;bethsnyderecf@gmail.com

Kara Katherine Gendron

on behalf of Debtor 1 Subetrice Ternice Samuel karagendronecf@gmail.com
doriemott@aol.com;mottgendronecf@gmail.com;bethsnyderecf@gmail.com

Leon P Haller

on behalf of Creditor Pennsylvania Housing Finance Agency/Homeowner's Emergency Mortgage Assistance Program (HEMAP)
lhaller@pkh.com dmaurer@pkh.com;mgutshall@pkh.com

United States Trustee

ustpreion03.ha.ecf@usdoj.gov

William E. Craig

on behalf of Creditor Americredit Financial Services Inc., d/b/a GM Financial ecfmail@mortoncraig.com,
mortoncraigecf@gmail.com

TOTAL: 7

LOCAL BANKRUPTCY FORM 3015-1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:
SUBETRICE TERNICE SAMUEL
fka Subetrice Ternice McGill
Debtor

: **CHAPTER 13**
:
: **CASE NO. 1:20-bk-02670**
:
: ☒ **ORIGINAL PLAN**
:
: ☐ **AMENDED PLAN (indicate 1ST, 2ND,**
: **3RD, etc.)**
:
: ☐ **0 Number of Motions to Avoid Liens**
:
: ☒ **1 Number of Motions to Value Collateral**

CHAPTER 13 PLAN

NOTICES

Debtors must check one box on each line to state whether or not the plan includes each of the following items. If an item is checked as "Not Included" or if both boxes are checked or if neither box is checked, the provision will be ineffective if set out later in the plan.

1	The plan contains nonstandard provisions, set out in § 9, which are not included in the standard plan as approved by the U.S. Bankruptcy Court for the Middle District of Pennsylvania.	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not Included
2	The plan contains a limit on the amount of a secured claim, set out in § 2.E, which may result in a partial payment or no payment at all to the secured creditor.	<input checked="" type="checkbox"/> 1 Included	<input type="checkbox"/> Not Included
3	The plan avoids a judicial lien or nonpossessory, nonpurchase-money security interest, set out in § 2.G.	<input type="checkbox"/> 0 Included	<input checked="" type="checkbox"/> Not Included

YOUR RIGHTS WILL BE AFFECTED

READ THIS PLAN CAREFULLY. If you oppose any provision of this plan, you must file a timely written objection. This plan may be confirmed and become binding on you without further notice or hearing unless a written objection is filed before the deadline stated on the Notice issued in connection with the filing of the plan.

1. PLAN FUNDING AND LENGTH OF PLAN.

A. Plan Payments From Future Income

1. To date, the Debtor paid \$0 (enter \$0 if no payments have been made to the Trustee to date). Debtor shall pay to the Trustee for the remaining term of the plan the following payments. If applicable, in addition to monthly plan payments, Debtor shall make conduit payments through the Trustee as set forth below. The total base plan is \$33,600.00, plus other payments and property stated in § 1B below:

Start mm/yy	End mm/yy	Plan Payment	Estimated Conduit Payment	Total Payment	Total Payment Over Plan Tier
10/2020	09/2025	\$560.00	\$		\$33,600.00
		\$	\$		\$
		\$	\$		\$
		\$	\$		\$
		\$	\$		\$
				Total Payments	\$33,600.00

2. If the plan provides for conduit mortgage payments, and the mortgagee notifies the Trustee that a different payment is due, the Trustee shall notify the Debtor and any attorney for the Debtor, in writing, to adjust the conduit payments and the plan funding. Debtor must pay all post-petition mortgage payments that come due before the initiation of conduit mortgage payments.

3. Debtor shall ensure that any wage attachments are adjusted when necessary to conform to the terms of the plan.

4. CHECK ONE: ☒ Debtor is at or under median income. If this line is checked, the rest of § 1.A.4 need not be completed or reproduced.

☐ Debtor is over median income. Debtor calculates that a minimum of \$0.00 must be paid to allowed unsecured creditors in order to comply with the Means Test.

B. Additional Plan Funding From Liquidation of Assets/Other

1. The Debtor estimates that the liquidation value of this estate is \$0.00. (Liquidation value is calculated as the value of all non-exempt assets after the deduction of valid liens and encumbrances and before the deduction of Trustee fees and priority claims.)

Check one of the following two lines.

☐ No assets will be liquidated. If this line is checked, skip § 1.B.2 and complete § 1.B.3 if applicable.

☒ Certain assets will be liquidated as follows:

2. In addition to the above specified plan payments, Debtor shall dedicate to the plan proceeds in the estimated amount of \$ from the sale of property known and designated as _____. All sales shall be completed by _____, 20____. If the property does not sell by the date specified, then the disposition of the property shall be as follows: _____.

3. Other payments from any source(s) (describe specifically) shall be paid to the Trustee as follows: Non-exempt proceeds, if any, from Workers Comp claim.

2. SECURED CLAIMS

A. Pre-Confirmation Distributions. *Check one.*

☐ None. If "None" is checked, the rest of § 2.A need not be completed or reproduced.

☒ Adequate protection and conduit payments in the following amounts will be paid by the debtor to the Trustee. The Trustee will disburse these payments for which a proof of claim has been filed as soon as practicable after receipt of said payments from the Debtor.

Name of Creditor	Last Four Digits of Account Number	Estimated Monthly Payment
GM FINANCIAL- BANKRUPTCY DEPT		\$56.00

1. The Trustee will not make a partial payment. If the Debtor makes a partial plan payment, or if

it is not paid on time and the Trustee is unable to pay timely a payment due on a claim in this section, the Debtor's cure of this default must include any applicable late charges.

2. If a mortgagee files a notice pursuant to Fed. R. Bankr. P. 3002.1(b), the change in the conduit payment to the Trustee will not require modification of this plan.

B. Mortgages (Including Claims Secured by Debtor's Principal Residence) and Other Direct Payments by Debtor. *Check one.*

☐ None. If "None" is checked, the rest of § 2.B need not be completed or reproduced. \

☒ Payments will be made by the Debtor directly to the creditor according to the original contract terms, and without modification of those terms unless otherwise agreed to by the contracting parties. All liens survive the plan if not avoided or paid in full under the plan.

Name of Creditor	Description of Collateral	Last Four Digits of Account Number
DAUPHIN COUNTY TAX CLAIM	1616 State St, Harrisburg, PA 17103	
Select Portfolio Servicing, Inc.	1616 State St, Harrisburg, PA 17103	

C. Arrears (Including, but not limited to, claims secured by Debtor's principal residence). *Check one.*

☐ None. If "None" is checked, the rest of § 2.C need not be completed or reproduced.

☒ The Trustee shall distribute to each creditor set forth below the amount of arrearages in the allowed proof of claim. If post-petition arrears are not itemized in an allowed claim, they shall be paid in the amount stated below. Unless otherwise ordered, if relief from the automatic stay is granted as to any collateral listed in this section, all payments to the creditor as to that collateral shall cease, and the claim will no longer be provided for under § 1322(b)(5) of the Bankruptcy Code:

Name of Creditor	Description of Collateral	Estimated Pre-petition Arrears to be Cured	Estimated Post-petition Arrears to be Cured	Estimated Total to be paid in plan
DAUPHIN COUNTY TAX CLAIM	1616 State St, Harrisburg, PA 17103	Per allowed proof of claim \$7,500 estimated		Per allowed proof of claim
Select Portfolio Servicing, Inc.	1616 State St, Harrisburg, PA 17103	Per allowed proof of claim \$ estimated		Per allowed proof of claim

D. Other secured claims (conduit payments and claims for which a § 506 valuation is not applicable, etc.)

☐ None. If "None" is checked, the rest of § 2.D need not be completed or reproduced.

☒ The claims below are secured claims for which a § 506 valuation is not applicable, and can include: (1) claims that were either (a) incurred within 910 days of the petition date and secured by a purchase money security interest in a motor vehicle acquired for the personal use of the Debtor, or (b) incurred within 1 year of the petition date and secured by a purchase money security interest in any other thing of value; (2) conduit payments; or (3) secured claims not provided for elsewhere.

1. The allowed secured claims listed below shall be paid in full and their liens retained until retained until the earlier of the payment of the underlying debt determined under nonbankruptcy law or discharge under §1328 of the Code.

2. In addition to payment of the allowed secured claim, present value interest pursuant to 11 U.S.C. §1325(a)(5)(B)(ii) will be paid at the rate and in the amount listed below, unless an objection is raised. If an objection is raised, then the court will determine the present value interest rate and amount at the confirmation hearing.

3. Unless otherwise ordered, if the claimant notifies the Trustee that the claim was paid, payments on the claim shall cease.

Name of Creditor	Description of Collateral	Principal Balance of Claim	Interest Rate	Total to be Paid in Plan
CITY OF HARRISBURG	1616 State St, Harrisburg, PA 17103	\$5,630.09		No payments required
PHFA /HEMAP	1616 State St, Harrisburg, PA 17103	\$6,662.00 approximately		Payment through plan of allowed secured claim

E. Secured claims for which a § 506 valuation is applicable. Check one.

☐ None. If "None" is checked, the rest of § 2.E need not be completed or reproduced.

☒ Claims listed in the subsection are debts secured by property not described in § 2.D of this plan. These claims will be paid in the plan according to modified terms, and liens retained until the earlier of the payment of the underlying debt determined under nonbankruptcy law or discharge under § 1328 of the Code. The excess of the creditor's claim will be treated as an unsecured claim. Any claim listed as "\$0.00" or "NO VALUE" in the "Modified Principal Balance" column below will be treated as an unsecured claim. The liens will be avoided or limited through the plan or Debtor will file an adversary action or other action (select method in last column). To the extent not already determined, the amount, extent or validity of the allowed secured claim for each claim listed below will be determined by the court at the confirmation hearing. Unless otherwise ordered, if the claimant notifies the Trustee that the claim was paid, payments on the claim shall cease.

Name of Creditor	Description of Collateral	Value of Collateral (Modified Principal)	Interest Rate	Total Payment	Plan, Adversary or Other Action
GM FINANCIAL-BANKRUPTCY DEPT	2011 Ford Flex blue (approx. 100,000 miles)	\$3,625.00	Lesser of 4.25% or contract rate	\$4,030.00	Plan--cramdown

F. Surrender of Collateral. Check one.

☒ None. If "None" is checked, the rest of § 2.F need not be completed or reproduced.

G. Lien Avoidance. Do not use for mortgages or for statutory liens, such as tax liens. Check one.

☒ None. If "None" is checked, the rest of § 2.G need not be completed or reproduced.

3. PRIORITY CLAIMS.

A. Administrative Claims

1. Trustee's Fees. Percentage fees payable to the Trustee will be paid at the rate fixed by the United States Trustee.

2. Attorney's fees. Complete only one of the following options:

a. In addition to the retainer of \$0.00 already paid by the Debtor, the amount of \$4,000.00 in the plan. This represents the unpaid balance of the presumptively reasonable fee specified in L.B.R. 2016-2(c); or

b. \$_____ per hour, with the hourly rate to be adjusted in accordance with the terms of the written fee agreement between the Debtor and the attorney. Payment of such lodestar compensation shall require a separate fee application with the compensation approved by the Court pursuant to L.B.R. 2016-2(b).

3. Other. Other administrative claims not included in §§ 3.A.1 or 3.A.2 above. *Check one of the following two lines.*

☒ None. If “None” is checked, the rest of § 3.A.3 need not be completed or reproduced.

B. Priority Claims (including, certain Domestic Support Obligations

Allowed unsecured claims entitled to priority under § 1322(a) will be paid in full unless modified under §9.

Name of Creditor	Estimated Total Payment
NONE	

C. Domestic Support Obligations assigned to or owed to a governmental unit under 11 U.S.C. §507(a)(1)(B). *Check one of the following two lines.*

☒ If “None” is checked, the rest of § 3.C need not be completed or reproduced.

4. UNSECURED CLAIMS

A. Claims of Unsecured Nonpriority Creditors Specially Classified. *Check one of the following two lines.*

☒ None. If “None” is checked, the rest of § 4.A need not be completed or reproduced.

B. All remaining allowed unsecured claims shall receive a pro-rata distribution of any funds remaining after payment of the other classes.

5. EXECUTORY CONTRACTS AND UNEXPIRED LEASES. *Check one of the following two lines.*

☒ None. If “None” is checked, the rest of § 5 need not be completed or reproduced.

6. VESTING OF PROPERTY OF THE ESTATE.

Property of the estate will vest in the Debtor upon

Check the applicable line:

☐ plan confirmation.

☐ entry of discharge.

☒ closing of case:

7. DISCHARGE: (Check one)

☒ The debtor will seek a discharge pursuant to § 1328(a).

☐ The debtor is not eligible for a discharge because the debtor has previously received a discharge described in § 1328(f).

8. ORDER OF DISTRIBUTION:

If a pre-petition creditor files a secured, priority or specially classified claim after the bar date, the Trustee will treat the claim as allowed, subject to objection by the Debtor.

Payments from the plan will be made by the Trustee in the following order:

Level 1: Adequate protection payments.

Level 2: Debtor's attorney's fees.

Level 3: Domestic Support Obligations.

Level 4: Secured claims, pro rata.

Level 5: Priority claims, pro rata.

Level 6: Specially classified unsecured claims.

Level 7: General unsecured claims.

Level 8: Untimely filed unsecured claims to which the debtor has not objected.

If the above Levels are filled in, the rest of § 8 need not be completed or reproduced.

9. NONSTANDARD PLAN PROVISIONS

Include the additional provisions below or on an attachment. Any nonstandard provision placed elsewhere in the plan is void. (NOTE: The plan and any attachment must be filed as one document, not as a plan and exhibit.)

(1) Claim amounts: The amounts of the claims listed in the plan and schedules are estimated amounts and are not admissions by the Debtors as to the amount(s) owed.

(2) Property surrendered under Section 2 F. shall be surrendered in full satisfaction of creditors' claims.

(3) Lien Releases.

(a) Personal Property: Upon the satisfaction, completion of cramdown payment, or other discharge of a security interest in a motor vehicle, mobile home, or in any other personal property of this estate in bankruptcy for which ownership is evidenced by a certificate of title, the secured party shall within thirty (30) days after the entry of the discharge order or demand execute a release of its security interest on the said title or certificate, and mail or deliver the certificate or title and release to the Debtor or to the attorney for the Debtor. Confirmation of this plan shall impose an affirmative and direct duty on each such secured party to comply with this provision.

(b) Real Property: Upon the, completion of cramdown payment, strip off, or other discharge of a security interest in real property, the secured party shall within sixty (60) days after the entry of the discharge order file a satisfaction piece or release of its security interest in the office of the Recorder of Deeds for the county in which the real estate is located. Confirmation of this plan shall impose an affirmative and direct duty on each such secured party to comply with this provision.

(4) Confirmation of this Plan shall not bar the Debtor from:

(a) filing objections to any claims;

(b) amending his schedules to add a creditor who was omitted from his schedules and to amend this Plan to provide for the treatment of such creditor or any other creditor who failed to timely file a proof of claim;

(c) seeking to avoid a lien under Section 522 of the Code or seeking the determination of the extent, validity and/or priority of any liens;

(d) seeking a determination as to the dischargeability of any debt; or

(e) selling any asset of his free and clear of liens and encumbrances.

/s/ Dorothy L. Mott, /s/ Kara K. Gendron

Dorothy L. Mott, Kara K. Gendron
Attorneys for Debtor(s)

/s/ Subetrice Ternice Samuel
Debtor

By filing this document, the debtor, if not represented by an attorney, or the Attorney for Debtor also certifies that this plan contains no nonstandard provisions other than those set out in § 9